

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION, )  
Plaintiff, )  
v. ) Docket No.: 1:15-CV-12857-PBS  
DFRF ENTERPRISES LLC *et al.*, )  
Defendants. )

**DEFENDANT ROMILDO DA CUNHA'S ASSENTED TO MOTION TO PARTIALLY  
RELEASE PREVIOUSLY FROZEN FUNDS**

NOW COMES Defendant, Romildo Da Cunha, by and through undersigned counsel, and hereby respectfully moves for an order releasing funds previously frozen by the government for ordinary living expenses. Counsel has corresponded with SEC Senior Trial Counsel Frank C. Huntington regarding this motion, and through him, the Securities and Exchange Commission assents to an order releasing \$2,000. This motion and assented to release of funds is without prejudice to the defendant seeking further relief from this Court for a greater release of funds for defendant's reasonable living expenses.

**LOCAL RULE CERTIFICATION**

Counsel for Mr. Cunha conferred with the Commission prior to filing this motion pursuant to Local Rule 7.1(a)(2).

**REQUEST FOR CARVE-OUT**

WHEREFORE, the Defendant respectfully requests this court to release \$2,000 of the frozen funds necessary for him to pay for reasonable living expenses.

8/10/15

attenuated

*Paul S. Sas*